

EXHIBIT D

**Exhibit A – Personal Injury / School District Plaintiffs and Attorneys General Plaintiffs
Proposed Bellwether Case Management Schedule**

In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation | Case
No. 4:22-md-03047-YGR

| Event | Deadline Pursuant to Standing Order in Civil Cases (Where Applicable) | PI/SD Plaintiffs and AG Plaintiffs Proposed Dates (Dates to which all Plaintiffs and Defendants agree are highlighted) |
|--|--|---|
| Dates Applicable to PI/SD Plaintiffs Only | | |
| Plaintiff Fact Sheets for PI/SD Cases | No Standing Order | May 13, 2024 (105 Days from Entry of CMO 8) ¹ |
| Selection of Bellwether Discovery Pools | No Standing Order | July 12, 2024 |
| PI/SD Plaintiffs and Defendants to Submit Simultaneous Briefing Identifying 12 Cases from Each Bellwether Discovery Pool to Select For Trial | No Standing Order | January 24, 2025 |
| Dates Applicable to All Parties | | |
| Close of Fact Discovery | No Standing Order | January 23, 2025 (partial agreement) ² |
| Plaintiffs' Expert Reports | No Standing Order | February 27, 2025 |
| Defendants' Expert Reports | No Standing Order | March 27, 2025 |
| Mutual Exchange of Rebuttal Expert Reports | No Standing Order | April 24, 2025 |
| Close of Expert Discovery | No Standing Order | May 30, 2025 |
| First Bellwether Trial Dispositive/ <i>Daubert</i> Motions ³ | No Standing Order | June 27, 2025 |

¹ Plaintiffs note that in CMO 8, the Court Granted the Proposed Implementation Order but the Order's entry is not yet reflected on the Docket, so the dates noted here in are approximate.

² Plaintiffs propose this date as the cut-off for all fact discovery, both general and case-specific. Defendants propose it as the end of fact discovery of Defendants and the end of "core" case-specific fact discovery, with "non-core" case-specific discovery continuing thereafter.

³ The Parties respectfully request that the Court's Pre-Filing Conference requirement be waived. See Standing Order in Civil Cases, at § 9.a. The Court's requirements and rules regarding summary judgement and *Daubert* motions otherwise apply. See Standing Order in Civil Cases, at § 9, 11.

| Event | Deadline Pursuant to Standing Order in Civil Cases (Where Applicable) | PI/SD Plaintiffs and AG Plaintiffs Proposed Dates (Dates to which all Plaintiffs and Defendants agree are highlighted) |
|---|--|--|
| Oppositions and Cross-Motion Briefs to First Bellwether Trial Dispositive/ <i>Daubert</i> Motions | 14 days after filing of opening brief | July 18, 2025 |
| Reply Briefs to First Bellwether Trial Dispositive/ <i>Daubert</i> Motions | 7 days after filing of oppositions | August 1, 2025 |
| <u>Motions in Limine Exchange</u> | <u>28 days prior to Pretrial Conference</u> | <u>August 8, 2025</u> |
| Exhibit Exchange | 28 days prior to Pretrial Conference | August <u>8</u> 1, 2025 |
| Written Transcript of All Exhibit Audio or Video Recordings to Opposing Counsel | 28 days prior to Pretrial Conference | August <u>8</u> 1, 2025 |
| <u>Motions in Limine Exchange</u> | <u>28 days prior to Pretrial Conference</u> | <u>August 8, 2025</u> |
| Deadline for Parties to conduct Pretrial Conference Statement Meet and Confer | 21 days prior to Pretrial Conference | August 15 <u>11</u> , 2025 |
| Deadline to file Compliance Joint Statement re Pretrial Conference Statement Meet and Confer | 5 days before Compliance Deadline for Pretrial Meet and Confer | August 10 <u>13</u> , 2025 |
| Motions in Limine | 15 days prior to Pretrial Conference | August 24 <u>13</u> , 2025 |
| Compliance Deadline for Pretrial Meet and Confer | 5 days after Deadline for Parties to conduct Pretrial Conference Statement Meet and Confer | July-August 16 <u>18</u> , 2025 |

| Event | Deadline Pursuant to Standing Order in Civil Cases (Where Applicable) | PI/SD Plaintiffs and AG Plaintiffs Proposed Dates (Dates to which all Plaintiffs and Defendants agree are highlighted) |
|--|---|--|
| Oppositions to Motions in Limine | 16 days prior to Pretrial Conference | August 20, 2025 |
| Pretrial Conference Statement | 15 days prior to Pretrial Conference | August 21, 2025 |
| Trial Readiness Filings and Binder | 14 days prior to Pretrial Conference | August 22, 2025 |
| Pretrial Conference | Third Friday preceding trial | September 5, 2025 |
| Copies of Exhibits to the Court | Friday prior to the trial date | September 19, 2025 |
| Anticipated Trial Date for First Bellwether Case | The Monday approximately 4 months after the expert discovery cutoff | September 22, 2025 |